

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

**1)ALAN BRUNA, 2) KELLEN SHERLOCK,)
3)PETE SHERLOCK, and 4)DUSTIN ROGGE,)**

Plaintiffs,)

v.)

**1)ROBERT EDWIN GATES,)
2)COGENT MEDICAL LABORATORY LLC,)
and 3)RNB HOLDINGS LLC,)**

Defendants.)

Case No. 20-cv-00628-GKF-CDL

COMPLAINT

COME NOW the Plaintiffs, Alan Bruna, Kellen Sherlock, Pete Sherlock, and Dustin Rogge, and for their cause of action against the Defendants, Robert Edwin Gates, Cogent Medical Laboratory LLC, and RNB Holdings LLC allege and state as follows:

1. The Plaintiffs, Alan Bruna, Kellen Sherlock, Pete Sherlock, and Dustin Rogge, are residents of the State of Kansas.

2. The Defendant, Cogent Medical Laboratory LLC (“Cogent”), is an Oklahoma Limited Liability Company whose principal office is in Tulsa County.

3. The Defendant, RNB Holdings LLC (“RNB”), is an Oklahoma Limited Liability Company whose principal office is in Tulsa County.

4. The Defendant, Robert Edwin Gates, is a resident of Tulsa County, Oklahoma.

5. The Plaintiffs, Alan Bruna, Kellen Sherlock, Pete Sherlock, and Dustin Rogge, are creditors of RNB and Cogent.

6. This Court has jurisdiction pursuant to 28 U.S.C. § 1332.

7. RNB was purportedly created by Robert Edwin Gates as a holding company for Cogent and other entities. Funds totalling \$850,000.00 were loaned to RNB by the Plaintiffs, as follows:

| | |
|-----------------|--------------|
| Alan Bruna | \$500,000.00 |
| Kellen Sherlock | \$125,000.00 |
| Pete Sherlock | \$125,000.00 |
| Dustin Rogge | \$100,000.00 |

8. Demand has been made for repayment of the funds advanced but Defendants have refused to repay the funds advanced.

FIRST CLAIM FOR RELIEF

Receivership

The Plaintiff incorporates by reference Paragraphs 1 through 5.

9. The Plaintiffs request that a Receiver be appointed by the Court to take over the operation of Cogent and RNB to secure repayment of the loan to Plaintiffs.

10. Assets of Cogent and RNB are in danger of being lost, removed, or materially injured.

WHEREFORE, Plaintiff prays that a Receiver be appointed to operate Cogent Medical Laboratory LLC., and RNB Holdings LLC, the costs of this action, and such other and further relief as the Court deems equitable and proper.

SECOND CLAIM FOR RELIEF

Indebtedness

The Plaintiffs incorporate by reference Paragraphs 1 through 10.

11. The Defendants are indebted to the Plaintiffs for a total of \$850,000.00 advanced to RNB for the operation and expansion of Cogent and any other entity affiliated with RNB.

WHEREFORE, Plaintiffs pray that the Court order the repayment of the \$850,000.00 advanced, with interest, the costs of this action, and such other and further relief as the Court deems equitable and proper.

Respectfully submitted,

SULLIVENT & FONTANEZ, PLLC

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